

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE TRONOX, INC. SECURITIES  
LITIGATION

File No. 09-CV-06220-SAS

**LEAD PLAINTIFFS' NOTICE OF MOTION FOR (I) PRELIMINARY  
APPROVAL OF SETTLEMENT, (II) CERTIFICATION OF THE CLASS FOR  
PURPOSES OF SETTLEMENT AND (III) APPROVAL OF NOTICE TO THE CLASS**

PLEASE TAKE NOTICE that upon the Stipulation and Agreement of Settlement dated August 3, 2012, attached hereto as Exhibit 1; the accompanying Memorandum of Law; and all other papers and proceedings herein, Lead Plaintiffs LaGrange Capital Partners, LP and LaGrange Capital Partners Offshore Fund, Ltd. will move this Court, under Rule 23 of the Federal Rules of Civil Procedure, at a date, time and location to be set by the Court, for an order: (i) preliminarily approving the proposed Settlement; (ii) certifying the proposed Class and Plaintiffs as Class representatives and appointing Lead Counsel as Class counsel for purposes of the Settlement; (iii) approving the form and manner of giving notice of the proposed Settlement to members of the Class; and (iv) scheduling a hearing on final approval of the Settlement and Lead Counsel's motion for an award of attorneys' fees and reimbursement of Litigation Expenses.

Attached hereto as Exhibit 2 is a copy of the proposed Order Preliminarily Approving Proposed Settlement and Providing for Notice (and its exhibits).

Dated: August 3, 2012

Respectfully submitted,

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By: /s Solomon B. Cera

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*Attorneys for Named Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 3, 2012, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all registered users.

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/s/Solomon B. Cera  
Solomon B. Cera